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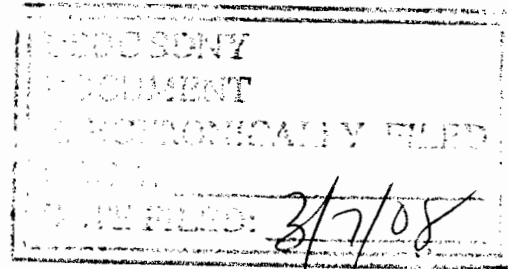
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March 7, 2008

VIA FACSIMILE

(Total number of pages: 4)

The Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007
Fax: 212-805-4268



Re: Zim Integrated Shipping Services Ltd. v. Belco Resources, Inc. et al.
Docket No.: 07 Civ. 5861 (RMB)(GWG)
Our File: 1236-689

Zim Integrated Shipping Services Ltd. et al. v. Produimport Empresa
Importadora et al.
Docket No.: 07 Civ. 6500 (RMB)(GWG)
Our File: 1236-699

Caribbean retail Ventures, Inc., v. Zim Integrated Shipping Services Ltd.
et al.
Docket No.: 07Civ. 6873 (RMB)(GWG)

Dear Magistrate Judge:

We represent plaintiff Zim Integrated Shipping Services, Ltd. ("Zim"), in the above captioned consolidated matters. The purpose of this letter is to request a conference with Your Honor to discuss the failure of defendants Belco Resources, Inc., ("Belco") and Nanjing Huabin Foreign Trade & Economics Co., Ltd. ("Huabin") to produce their initial disclosures pursuant to Fed. R. Civ. P. 26(a).

The parties held a conference of the parties pursuant to Fed. R. Civ. P. 26(f) on January 3, 2008. Your Honor issued a pretrial scheduling Order on January 14, 2008. Plaintiff produced its initial disclosures on February 6, 2008. Two of its witnesses have been deposed. Plaintiff

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handed a CD-Rom to each defendant containing 1216 pages of documents. On February 22, 2008, the undersigned sent a letter by facsimile and e-mail to all the defendants in the three consolidated actions requesting the production of their initial disclosures by February 29, 2008, as a good faith attempt to secure discovery without court action (copy attached).

On February 29, 2008, counsels for defendants Sinochem Jiangsu Corporation and for underwriters AIG and Falcon have indicated that they were preparing their initial disclosures and would serve them by mid next week. However, plaintiff has not received any response from defendants Belco and Huabin regarding their initial disclosures.

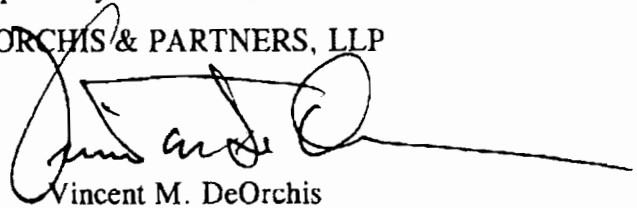
We seek the Court's intervention as the deadline to complete all non expert discovery expires in a little over three months.

We thank Your Honor for his attention in this matter.

Respectfully Submitted,

DEORCHIS & PARTNERS, LLP

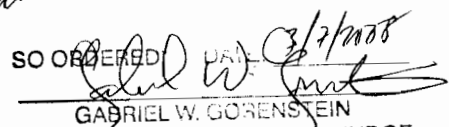
By


Vincent M. DeOrchis

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*Application denied without prejudice
to renewal, if necessary, upon compliance
with paragraph 2.A of this Court's
Individual Practices.*

SO ORDERED


GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE